

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION - DETROIT**

IN THE MATTER OF:

Gwendalyn D Moore

CHAPTER 13

CASE NO. 21-46500-MAR

JUDGE MARK A RANDON

Debtor

/

TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN

Now Comes the Chapter 13 Trustee, KRISPEN S. CARROLL, and files her objections pursuant to E.D. Mich. LBR 3015-3(a) and opposes confirmation of the Chapter 13 Plan where it does not comply with Bankruptcy Code provisions, 11 U.S.C. §§ 1325, 1322, other applicable provisions of Title 11 Chapter 13 and Local Bankruptcy Rules, as follows:

1. Trustee objects to confirmation pursuant to 11 U.S.C. § 1325(a)(9) where based upon the Notice of City of Detroit Unfiled Tax Returns, debtor has failed to file all applicable local tax returns as required by 11 U.S.C. § 1308.

Wherefore, the Chapter 13 Trustee prays this Honorable Court deny confirmation of the debtor's Chapter 13 Plan and for other and further relief as the Court deems appropriate, including dismissal.

Dated: October 08, 2021

OFFICE OF THE CHAPTER 13 TRUSTEE -DETROIT
KRISPEN S. CARROLL, CHAPTER 13 TRUSTEE

/s/ KRISPEN S. CARROLL-mcs

Krispen S. Carroll (P49817)

Margaret Conti Schmidt (P42945)

Maria Gotsis (P67107)

719 Griswold Street, Ste 1100

Detroit, MI 48226

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CERTIFICATE OF MAILING

I hereby certify that on the date indicated below, I electronically filed TRUSTEE'S SUPPLEMENTAL OBJECTIONS TO CONFIRMATION OF CHAPTER 13 PLAN with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

FREEDOM LAW PC
18121 E EIGHT MILE RD STE 301
EASTPOINTE, MI 48021

October 08, 2021

/s/ Shannon Horton

SHANNON HORTON

For the Office of the Chapter 13 Trustee-Detroit

719 Griswold Street, Ste 1100

Detroit, MI 48226

(313) 962-5035

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